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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ZAN KORBA, individually, a Nevada  
Resident,

vs.  
Plaintiff,  
THE HARTFORD UNDERWRITERS  
INSURANCE COMPANY, a foreign  
insurance company; DOES I through 100,  
inclusive; and ROE CORPORATIONS I  
through 100; inclusive,  
Defendants.

CASE NO. 2:12-cv-01391-GMN-PAL

**REQUEST FOR EXPEDITED BRIEFING  
SCHEDULE**

Plaintiff, Zan Korba, respectfully submits the instant request for an expedited briefing schedule and hearing date for his Countermotion for Protective Order, which is submitted jointly with his Opposition to Hartford's Motion for Protective Order, ECF No. 51.

**I. INTRODUCTION**

The parties have a pending discovery dispute regarding the appropriate scope of a Rule 30(b)(6) deposition of Defendant Hartford. The parties have already agreed to an expedited briefing schedule on that matter, which was approved and ordered by this Court, ECF 49. The hearing for that motion has been set for September 19, 2013. ECF No. 49.

## II. PROPOSED SCHEDULE

Hartford has noticed the Continued Deposition of Plaintiff Zan Korba for September 24, 2013.

As set forth in Plaintiff's Opposition and Countermotion, Plaintiff is seeking protection and/or limitation on that deposition. As the hearing on Hartford's Motion for Protective Order is set for September 19, 2013, Plaintiff proposes using that same hearing date to decide its Motion for Protective Order.

Accordingly, Plaintiff proposes using the following briefing schedule:

1. Plaintiff will file its Counter motion on Friday, September 6, 2013
2. Hartford's Opposition will be due on September 13, 2013
3. Plaintiff's Reply will be due on September 17, 2013
4. The hearing of Plaintiff's Counter motion for Protective Order will take place on September 19, 2013 at 9:00, jointly with the hearing on Hartford's Motion for Protective Order.

In the event that the Court is unable to hear this matter based on the briefing schedule above, Plaintiff requests that the Court revise the Briefing schedule as necessary to accommodate a hearing prior to the September 24, 2013 deposition.

DATED this 6th day of September, 2013.

HALL JAFFE & CLAYTON, LLP

By /s/ Michael R. Hall  
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## **ORDER**

## **IT IS SO ORDERED:**

Terry A. Feen

DATED: September 10, 2013

## **CERTIFICATE OF SERVICE**

Pursuant to Rule 5(b) of the Federal Rules of Civil Procedure, I hereby certify under penalty of perjury that I am an employee of HALL JAFFE & CLAYTON, LLP, and that on the 6th day of September, 2013, the foregoing **REQUEST FOR EXPEDITED BRIEFING SCHEDULE** was served upon the parties via the Court's e-filing and service program addressed as follows:

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/s/ Lisa C. Johnson  
An Employee of  
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